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August 21, 2023

VIA ECF

The Honorable Tonianne J. Bongiovanni
United States District Court
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *Strougo v. Mallinckrodt PLC, et al.*,
Civil Action No.: 3:20-cv-10100 (RK) (TJB)

Dear Magistrate Judge Bongiovanni:

We, along with Lead Counsel, write on behalf of Lead Plaintiff Canadian Elevators Industry Pension Trust Fund ("CEIPTF") and Named Plaintiff City of Sunrise Police Officers' Retirement Plan ("COSPORP," and with CEIPTF, "Plaintiffs"), to request that the Court enter the below proposed briefing schedule regarding Plaintiffs' forthcoming motion to exclude the report and opinions of Defendants' class certification expert witness, Paul M. Zurek, Ph.D., pursuant to Federal Rule of Evidence 702 ("Rule 702").

Lead Counsel informed Defendants' counsel of its intention to submit this motion on August 17, 2023. Currently, the parties are in the midst of briefing Plaintiffs' motion for class certification. Plaintiffs served their opening motion for class certification on August 10, 2023. Defendants' opposition motion for class certification is scheduled to be submitted October 10, 2023, and Plaintiffs' reply is due on December 7, 2023.

Defendants' counsel has agreed to the below briefing schedule, with the papers being served amongst the parties on the respective dates herein. The fully briefed motion will then be filed with the Court upon this schedule's completion, in accordance with this District's former Appendix N procedure. Accordingly, these motions fall within the existing class certification briefing schedule, and will not create any prejudice or delay.

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EVENT	DEADLINE
Plaintiffs' Motion to Exclude Defendants' Expert Rebuttal Report and Opinions	August 21, 2023
Defendants' Opposition to Plaintiffs' Motion to Exclude Defendants' Expert Rebuttal Report and Opinions	October 23, 2023
Plaintiffs' Reply to Defendants' Opposition to Plaintiffs' Motion to Exclude Defendants' Expert Rebuttal Report and Opinions	December 7, 2023 ★

For the foregoing reasons, Plaintiffs respectfully request that the Court enter the above-mentioned proposed Scheduling Order. Plaintiffs appreciate the Court's attention to this matter and are prepared to address it further at the Court's convenience.

Respectfully submitted,

/s/ James E. Cecchi
 JAMES E. CECCHI

Enclosures

cc: All Counsel of Record (via ECF)

★ To be filed pursuant to
 former Appendix N provision.

So Ordered
 Long
 USMT
 8/22/23